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March 17, 2022

**VIA ECF**

The Honorable Ronnie Abrams  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Tavarez v. Akervall Technologies, Inc.*, Case No. 1:21-cv-9895 (RA)

Dear Judge Abrams:

We represent plaintiff Victoriano Tavarez (“Plaintiff”) in the above-referenced class action. In accordance with this Court’s Individual Rules and Practices in Civil Cases Rule 1(D), we respectfully write to request an extension to oppose Defendant’s motion to dismiss, filed March 8, 2022. *See* Docket No. 22. Plaintiff respectfully requests an additional 30 days to file the opposition, with a reasonable period for Defendant to file its reply to follow. Plaintiff’s opposition was original due on March 23, 2022. This is Plaintiff’s first request for an extension and is made on consent.

Respectfully submitted,  
/s/ William J. Downes  
William J. Downes, Esq.

Cc: All Counsel of Record (via ECF)

Application granted.

Plaintiff's opposition to Defendant's motion to dismiss shall be filed on or before April 25, 2022. Defendant's reply shall be filed no later than May 16, 2022.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'RA', is written over a horizontal line.

Hon. Ronnie Abrams  
03/18/2022